

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Olympia Y. Howell
Debtor

Rushmore Servicing as Servicer for
U.S. Bank National Association, not in
its individual capacity but solely as
trustee for RMTP Trust, Series 2021,
BKM-TT-V
Movant
v.

Olympia Y. Howell - Debtor
Kenneth E. West - Trustee
Respondents

CASE NO.: 20-11702-amc

CHAPTER 13

JUDGE: Ashely M. Chan

CERTIFICATION OF DEFAULT

FRIEDMAN VARTOLO, LLP, attorneys for Movant, hereby certifies that the above-captioned Debtor has failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Judge Eric L. Frank on April 5, 2022. A copy of the Stipulation is attached hereto as **Exhibit “A”**. Movant certifies that the required Notice of Default required by the Order was sent to Debtor and Debtor’s attorney on June 28, 2024 and Debtor has failed to cure the default. A copy of the Notice of Default is attached hereto as **Exhibit “B”**. In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's property.

Dated: August 20, 2024

By: /s/ Lauren M. Moyer
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